

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
FCC Seeks Comment on the National)	
Telecommunications and Information)	
Administration's Report "An Assessment of the)	ET Docket No. 00-258
Viability of Accommodating Advanced Mobile)	
Wireless (3G) Systems in the 1710-1770 MHz)	
and 2110-2170 MHz Bands.")	

**COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association ("TIA") hereby submits comments in response to the Public Notice in the above-captioned proceeding.¹ TIA is the leading trade association representing the communications and information technology industry, with over 1,100 member companies that manufacture or supply the products and services used in global communications. Among their numerous lines of business, TIA member companies design, produce and deploy terrestrial and satellite wireless network and terminal equipment. As a result, TIA has a substantial interest in current and future Commission spectrum management decisions related to advanced wireless services.

The Federal Communications Commission ("FCC" or "Commission") seeks comment on the final report, *"An Assessment of the Viability of Accommodating*

¹ Public Notice, DA 02-1780 (released July 24, 2002).

Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands” released by the National Telecommunications and Information Administration (“NTIA”) on July 23, 2002 (“*NTIA Report*”).

The *NTIA Report* was prepared by the NTIA, in cooperation with the FCC, Department of Defense (“DoD”), and other federal agencies, and explores the viability of making all or a portion of the 1710 - 1770 MHz and 2110 - 2170 MHz bands available for advanced wireless services. The *NTIA Report* sets forth a plan for the reallocation of 90 MHz for advanced wireless services consisting of 45 megahertz from the 1710 - 1755 MHz band and 45 megahertz from within the 2110 - 2170 MHz band.

I. Discussion

1710-1755 MHz Band Paired with at Least 45 MHz from the 2110-2170 MHz Band

TIA generally supports the *NTIA Report* and its conclusion that 90 MHz should be made available for commercial wireless services in the 1710 - 1755 MHz band, to be paired with at least 45 MHz from the 2110 - 2170 MHz band. TIA recognizes that this is an important step forward in enabling the deployment of advanced wireless services to U.S. consumers. However, TIA also notes that the compromise proposals contained in the *NTIA Report* neither reflect the amount nor the specific bands of spectrum that the mobile wireless industry had identified for advanced mobile wireless services. The 90 MHz of spectrum identified for advanced wireless services in the *NTIA Report* falls far short of the estimated 200 MHz of spectrum needed for these mobile services by 2010.

TIA urges the Commission and NTIA to work towards identifying more spectrum in the near-term for advanced wireless services, including revisiting the possibility of relocation and sharing in the spectrum above 1755 MHz and urges the Commission to allocate the entire 2110 - 2170 MHz band for advanced wireless services. Inclusion of this additional spectrum would provide a greater degree of global spectrum harmonization.

Spectrum harmonization provides important benefits to technology providers and service operators that can be passed on to consumers. For example, with harmonization consumers can have access to terminals that are less expensive, smaller, have lower power consumption, longer usage times, more functionality and better serve the needs of the customer. Furthermore, service providers can provide national, international and/or global roaming more cost effectively. New products and services can be brought to market more quickly, and can be offered in greater variety. Finally, the terrestrial wireless and satellite markets can grow faster.

1755-1770 MHz Band Viability for Advanced Mobile Wireless Systems

The *NTIA Report* concludes that the 1755 - 1770 MHz band is not viable for use by advanced wireless services (3G) for three reasons. First, the impact to or constraints on DoD mobile radiocommunication system operations would be significant and unacceptable in light of DoD's extensive and critical operations in this band. Second, sharing between 3G and DoD terrestrial systems in this band would not be possible in light of the large geographical separation distances required. Third, the DoD satellite ground control stations would interfere with 3G base stations at large geographical

distances. In addition, NTIA determined that no suitable alternate federal and/or commercial spectrum could be identified for satisfactory relocation of DoD systems. NTIA further states that a leap forward in technology may permit extensive sharing in all bands below 3 GHz in the future. However, until that time, NTIA believes that use of the 1755 - 1770 MHz band for advanced wireless applications is not considered viable.

TIA has reviewed the *NTIA Report's* conclusion that the 1755 - 1770 MHz band is not viable for advanced wireless mobile systems in the immediate future. TIA agrees that future technology advancements and better spectrum management may allow for extensive sharing between and among commercial and government uses of spectrum below 3 GHz. Therefore, the FCC and NTIA should continue to explore the feasibility of making available for advanced wireless services the 1755 - 1770 MHz band, paired with the 2155 - 2170 MHz band, in the near-term.

2110-2170 MHz Band Viability for Advanced Mobile Wireless Systems

The *NTIA Report* sets forth a plan for the reallocation of 45 MHz from within the 2110 - 2170 MHz band. However, TIA respectfully requests that the Commission employ this current proceeding to reallocate all 60 MHz in the 2110 - 2170 MHz band. TIA believes that the 2155 - 2170 MHz portion of this band can be allocated now but should not be auctioned until it can be paired with appropriate spectrum.

If, however, the Commission cannot reallocate all 60 MHz within the 2110 - 2170 MHz band now, TIA urges the Commission to immediately reallocate the 45 MHz within

the 2110 - 2155 MHz band. This would ensure the benefits of contiguous spectrum for 3G.

Reallocation and Service Rules

TIA strongly encourages the FCC to immediately write new service rules for advanced wireless services to ensure that DoD is able to relocate from 1710 - 1755 MHz as quickly as possible after the auction of this band. In order to ensure a successful auction, the FCC should collaborate with NTIA, DoD, and any other affected federal users to quickly and accurately determine the costs of relocating incumbents from this band. Moreover, TIA strongly supports the creation of a relocation trust fund for DoD and other government users that will need to be relocated from the 1710 - 1755 MHz band.

Finally, TIA urges the FCC to assist DoD in minimizing potential interference from the NASA Goldstone facility and the Cherry Point and Yuma sites into the commercial licensees in those markets.

II. *Conclusion*

TIA member companies design, develop and manufacture communications equipment, including terrestrial and satellite wireless systems that are subject to, and affected by, the Commission's regulatory oversight and spectrum management responsibilities. TIA therefore has a direct and substantial interest in the spectrum-related activities of the Commission and, more specifically, in the outcome of the issues addressed in the *NTIA Report*. TIA requests that the Commission take into consideration the views expressed above.

Respectfully submitted,

Telecommunications Industry Association

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